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Although the arguments in favor of eliminating the telegraphy requirement for some Amateur license classes may be valid, there are good reasons to retain the requirement for other license classes. The FISTS petition and ARRL petition correctly state the merits of telegraphy in the Amateur Radio Service. It should be plainly obvious to the Commission that telegraphy has some value to the amateur service. We often see the dominance of telegraphy over voice and digital modes in amateur exercises such as Field Day. The factors that make telegraphy superior during these exercises are precisely the same as would exist in a large national disaster. Therefore, telegraphy has value to the public.

The commission's conclusion that eliminating the telegraphy testing requirement would, "enhance the usefulness of the amateur service to the public and licensees," [paragraph 47] is incorrect. By allowing operators to transmit signals over public airwaves without assessing the operators' ability to understand the signals, the commission is remiss. Forcing proficient telegraphers to share spectrum with unskilled operators diminishes the effectiveness of proficient operator and the usefulness of the amateur service. The commission should encourage individuals to develop telegraphy skills, not discourage them. Since amateur signals can be heard worldwide, allowing unskilled operators to transmit becomes a national embarrassment.

Most arguments in favor of eliminating the telegraphy examination requirement are based on assumption that the requirement discourages individuals from seeking a license. Although, this argument is valid, there is no need to completely eliminate the requirement for all license classes. As with the Technician Plus class license, the General Plus and Amateur Extra Plus license classes could distinguish whether the operator has demonstrated telegraphy proficiency. Certain sub-bands in the MF and HF bands should be reserved for licensees who have passed a telegraphy examination. Such a licensing structure would not discourage individuals who do not have an interest in telegraphy from obtaining licenses. It would also protect telegraphy operators from interference and abuse from unskilled operators. This would not preclude an operator who has not passed a telegraphy test from using telegraphy outside the exclusive sub-bands. It would also satisfy the vanity of non-savvy telegraph operators who desire Extra Class callsigns.

The commission's contention that a one-time telegraphy examination does not guarantee continued proficiency is certainly correct [paragraph 19]. However, eliminating the examination is not a solution. Re-examination could be required for

license renewal. Any moderately active telegraph operator could easily pass a comprehensive code examination even at the traditional rates of 13 & 20 WPM.

Many petitioners' arguments against telegraphy are also flawed [paragraph 10]. The reason that commercial telegraphy has become virtually obsolete is economic—technology has become more cost effective than skilled labor. Since amateur operators are unpaid, operator skill does not have an economic impact, as does technology. The burden of telegraphy examinations on volunteer examiners is inconsequential. As volunteers, examiners are not required to participate in a process that they consider to be too great of a burden. Telegraphy examinations are best conducted by VEC organizations that recognize the value of skilled telegraphy operators. Other arguments against telegraphy based on economics should not be considered—the value of telegraphy to the amateur service outweighs any associated expense.

Although recent technical advancements have vastly improved the communication and cost effectiveness of certain digital transmission modes, the effectiveness of a skilled telegrapher has by no means been diminished. In spite of recent technical advancements, a telegraphy station with a skilled operator can communicate far more effectively than a voice or digital station in extremely poor conditions. Modern digital modes are highly dependant on technology and electrical power unlike a telegraphy station with human operator. In the worst type of national disaster, telegraphy stations would be first on the air.

Historically, the commission has made decisions based on political expediency or other non-technical factors. When the foolishness of such decisions later becomes apparent, it is often too late to correct the problem [i.e. the adoption of the NTSC standard.] When the folly of deleting the telegraphy requirement for all amateur radio examinations becomes apparent, there will be little course for correction. The integrity of the amateur service is something many amateurs hold dear—more so than the commission.